

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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DANIEL LOVELACE AND HELEN  
LOVELACE

Plaintiffs,

vs.

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
DR. BABU RAO PAIDIPALLI &  
DR. MARK P. CLEMONS

Defendants.

Case No. 2:13-CV-02289 dkv

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**METHODIST HEALTHCARE – MEMPHIS HOSPITALS' MOTION TO QUASH  
DEFENDANTS' SUBPOENA AND MOTION FOR PROTECTIVE ORDER**

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COMES NOW non-party Witness Methodist Healthcare – Memphis Hospitals (“Methodist” or “Witness”), by and through undersigned counsel, and files this Motion to Quash or Modify the Defendants' Subpoena and Motion for Protective Order. For the reasons set forth in the Methodist's Memorandum of Law in Support of its Motion to Quash Defendants' Subpoena and Motion for Protective Order, submitted herewith, the Witness requests that the Court enter an Order quashing or modifying the Subpoena served on counsel for Methodist by Defendants Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D. The Witness further requests that the Court enter a Protective Order prohibiting the parties to this action from seeking information from the Witness that requires disclosure of privileged, confidential, or protected documents, or otherwise places an undue burden on the Witness.

In support of their Motion, the Witness relies on its Memorandum of Law in Support, the exhibits attached thereto, and the entire record in this cause.

Wherefore, Witness Methodist Healthcare - Memphis Hospitals respectfully requests that this Court grant its Motion and enter (1) an Order quashing the Subpoena that was served upon counsel for Witness by Defendants Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D. and (2) a Protective Order prohibiting the parties to this action from seeking information from the Witness that requires disclosure of privileged, confidential, or protected documents, or otherwise places an undue burden on the Witness.

Respectfully submitted,

s/ Craig C. Conley

Craig C. Conley (# 19341)  
Ormonde B. DeAllaume (# 26266)  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
Telephone: (901) 526-2000  
Facsimile: (901) 577-2303  
cconley@bakerdonelson.com  
odeallaume@bakerdonelson.com

*Attorneys for Non-Party Witness  
Methodist Healthcare – Memphis Hospitals*

**CERTIFICATE OF CONSULTATION**

Pursuant to 26(c)(1) of the Federal Rules of Civil Procedure and Local Rule 7.2(a)(1)(B), Mr. Conley and Mr. McLean have exchanged emails and consulted via the telephone, but have been unable to resolve this dispute.

s/ Craig C. Conley  
Craig C. Conley

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 21st day of August, 2013, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Craig C. Conley  
Craig C. Conley